



Order Filed on June 26, 2017  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
TRENTON VICINAGE

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

STERN, LAVINTHAL & FRANKENBERG, LLC

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Roseland, NJ 07068

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Attorney for Secured Creditor,

**Cenlar FSB as servicing agent for Police and  
Firemen's Retirement System Board of Trustees by  
its Administrative Agent New Jersey Housing and  
Mortgage Finance Agency**

By: Jeanette F. Frankenberg, Esq.

In Re:

Jason R Mohr

Lydia Mohr

Debtor(s)

Case No.: 17-15155-KCF

Chapter: 13

Hearing Date: June 14, 2017

Judge: Kathryn C. Ferguson, U.S.B.J.

**CONSENT ORDER RESOLVING MOTION TO VACATE STAY AND SECURED  
CREDITOR'S OBJECTION TO CONFIRMATION**

The consent order set forth on the following pages, numbered two (2) through three (3),  
is hereby **ORDERED**.

**DATED: June 26, 2017**

  
Honorable Kathryn C. Ferguson  
United States Bankruptcy Judge

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Debtor: Jason R. Mohr & Lydia Mohr

Case No: 17-15155-KCF

Caption: Consent Order Resolving Motion to Vacate Stay & Secured Creditor's Objection to Confirmation

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Applicant:	<u>Cenlar FSB</u>
Applicant's Counsel:	<u>Stern Lavinthal &amp; Frankenberg, LLC</u>
Debtor's Counsel:	<u>Francis P. Cullari, Esq.</u>
Property Involved ("Collateral"):	<u>34 Avenue H, Monroe Twp., New Jersey</u>

Relief sought:

- ✓ Motion for relief from the automatic stay
- Motion to dismiss
- Motion for prospective relief to prevent imposition of automatic stay

against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Applicant's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:

- The Debtor is overdue for 3 months, from April 1, 2017 to June 1, 2017.
- The Debtor is overdue for 3 payments at \$3,122.74 per month.

Total Arrearages Due \$9,368.22

2. Debtor must cure all post-petition arrearages, as follows:

- Immediate payment shall be made in the amount of \$9,368.22. Said payment shall be received on or before June 30, 2017 payment.
- Regular monthly mortgage payments in the amount of \$3,122.74 shall continue to be made beginning with the July 1, 2017 payment.
- Debtor shall have until the deadline of October 15, 2017 to attempt to sell the Property.
- If the Debtor shall fail to sell the property or have the property under contract for sale by October 15, 2017, Secured Creditor shall obtain Automatic Stay Relief as to the Collateral without the need of a further Order from this Court.

3. This Order shall be incorporated in and become part of any Order Confirming the Chapter 13 Plan in the herein matter.

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Debtor: Jason R. Mohr & Lydia Mohr

Case No: 17-15155-KCF

Caption: Consent Order Resolving Motion to Vacate Stay & Secured Creditor's Objection to Confirmation

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4. Payments to the Secured Creditor shall be made to the following address(es):

- ✓ Immediate payment: Cenlar FSB  
425 Phillips Blvd.  
Ewing, NJ 08618
- ✓ Regular monthly payment: Cenlar FSB  
425 Phillips Blvd.  
Ewing, NJ 08618

In the event of Default:

If the Debtors fail to make the immediate payment specified above or fail to make any regular monthly payment or the additional monthly cure payment within thirty (30) days of the date the payments are due, then the Secured Creditor may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, a Certification specifying the Debtors' failure to comply with this Order. At the time the Certification is filed with the court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and the Debtors' attorney.

If the bankruptcy case is dismissed, or if the automatic stay is vacated, the filing of a new bankruptcy case will not act to impose the automatic stay against the Secured Creditor's opportunity to proceed against its Collateral without further Order of the Court.

5. Award of Attorneys' Fees:

- ✓ The Applicant is awarded attorney's fees of \$350.00, and costs of \$181.00.

The fees and costs are payable through the Chapter 13 plan.

The undersigned hereby consent to the form and entry of the foregoing order



Francis Cullari, Esq.  
Attorney for the Debtor

/s/ Jeanette F. Frankenberg

Jeanette F. Frankenberg, Esq.  
Attorney for Secured Creditor

**Certificate of Notice Page 4 of 4**  
United States Bankruptcy Court  
District of New Jersey

In re:  
Jason R Mohr  
Lydia Mohr  
Debtors

Case No. 17-15155-KCF  
Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0312-3

User: admin  
Form ID: pdf903

Page 1 of 1  
Total Noticed: 1

Date Rcvd: Jun 26, 2017

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jun 28, 2017.

db/jdb +Jason R Mohr, Lydia Mohr, 34 Avenue H, Monroe Township, NJ 08831-2222

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Jun 28, 2017

Signature: /s/Joseph Speetjens

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**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on June 26, 2017 at the address(es) listed below:

Albert Russo docs@russotrustee.com  
Denise E. Carlson on behalf of Creditor Toyota Motor Credit Corporation  
dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com  
Francis P. Cullari on behalf of Joint Debtor Lydia Mohr cullari@comcast.net  
Francis P. Cullari on behalf of Debtor Jason R Mohr cullari@comcast.net  
Jeanette F. Frankenberg on behalf of Creditor Cenlar FSB as servicing agent for Police and  
Firemens Retirement System Board of Trustees by its Administrative Agent New Jersey Housing and  
Mortgage Finance Agency cmecf@sternlav.com  
U.S. Trustee. USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 6